



U.S. Department of Energy
Office of River Protection

**P.O. Box 450
Richland, Washington 99352**

02-OSR-0466

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – RESPONSE TO FINDINGS OF
CONFIGURATION MANAGEMENT INSPECTION REPORT, IR-02-007

- Reference:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Bechtel National, Inc.'s Response to Inspection Report IR-02-007 - Configuration Management Inspection," CCN 038148, dated August 29, 2002.
 2. ORP letter from R. C. Barr to R. F. Naventi, BNI, "Inspection Report IR-02-007 - Configuration Management Inspection," 02-OSR-0270, dated July 8, 2002.

This letter rejects the Bechtel National, Inc. (BNI) response (Reference 1) that addressed Configuration Management Inspection Report Findings documented in Reference 2. The U.S. Department of Energy, Office of River Protection (ORP) concluded the responses to IR-02-007-02-FIN and IR-02-007-FIN (a, b, and c) were incomplete, as discussed in the Enclosure. It was also noted that your response was inconsistent with the commitment made by the Project Manager during the Configuration Management inspection exit meeting to identify and correct the underlying issues associated with implementing the Configuration Management program.

In addition to the Findings described in Reference 2, ORP inspectors also have found a significant number of Configuration Management related Corrective Actions Reports (CARs) in BNI's deficiency reporting system. Based on your incomplete response to Reference 2 and a significant number of Configuration Management CARs, BNI senior management attention appears warranted to provide assurances that the configuration management is adequately implemented for the Waste Treatment and Immobilization Plant (WTP) Project.

You are requested to submit, within 15 days, a supplemental response addressing the deficiencies discussed in the Enclosure and the steps, which will be taken to improve the performance of your process for formulating and implementing corrective actions. Also, please describe the actions you plan to take to provide the assurance that Configuration Management is adequately implemented for the WTP.

Mr. R. F. Naventi
02-OSR-0466

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If you have any questions, please contact me, or your staff may call P. P. Carier, Office of Safety Regulation, (509) 376-3574.

Sincerely

OSR:JEA

Roy J. Schepens
Manager

Enclosure

Office of River Protection (ORP)
Summary of Bechtel National, Inc.'s (BNI) Response Deficiencies
for Configuration Management Report, IR-02-007

The deficiencies identified with BNI's response to Inspection Report IR-02-007 are as follows:

1. In response to IR-02-007-02-FIN regarding the lack of formal procedure or instruction for entering configuration document information into the configuration management (CM) database, the BNI response stated, among other things, the records sections of six Engineering procedures would be revised to provide direction to Project Document Control (PDC). However, it is not clear how this corrective action will prevent recurrence of the condition described in the finding. Specifically, the corrective action didn't address the issue of establishing a process for identifying and correcting data entry errors by PDC personnel or how the BNI Engineering Manager would ensure the effectiveness of this process.
2. In response to IR-02-007-03 (a, b, c), regarding the failure to properly implement various procedures related to implementing the CM program, the BNI response indicated specific documentation problems identified by the inspectors were corrected and correspondence was distributed instructing engineering personnel to follow procedures. The following deficiencies are related to the response:
 - The response does not describe the extent of the condition described in the finding or how such a determination was made. Since the problems identified in the inspection report were the result of examining a very small sample of engineering documentation, it is highly unlikely that the condition is limited to these documents. Accordingly, the ORP cannot conclude that BNI has determined the extent of the condition or corrected the affected CM documents.
 - The action taken to prevent recurrence of this condition (i.e., transmitting correspondence to engineering personnel stating that procedure compliance is required) is inadequate. Project personnel are provided with direction to follow procedures as part of their training, and this basic message has been reiterated on a number of occasions in response to past problems. From interviews with project personnel, the ORP inspectors have determined the BNI project personnel are well aware of this expectation. Therefore, the ORP cannot conclude that this corrective action will be effective in preventing recurrence of the condition.
3. In the letter transmitting IR-02-007, the ORP identified problems regarding management responsibility and accountability associated with the CM program. The BNI response to this issue summarized procedural information on the subject (information that the ORP inspectors had previously reviewed in detail as described in the inspection report) and deferred further action in this regard to the completion of a "Six Sigma evaluation." The ORP cannot evaluate BNI's plan to perform a "Six Sigma evaluation." The ORP can evaluate the corrective actions derived from the process and the results achieved, however these were not described. It appears that the basic issue

(ensuring CM-program ownership is reinforced with appropriate project managers) does not need to be delayed pending the results of the “Six Sigma” process. On this basis, the ORP concluded that the issue of management responsibility and accountability for CM has not been properly addressed.

Therefore, the ORP finds the BNI responses addressing Configuration Management Inspection Report Findings, IR-02-007-02-FIN and IR-02-007-FIN (a, b, and c) unacceptable.